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basis of the ruling is that both manager and stenographer are in a common employment, and under such circumstances the stenographer is not to be regarded as a stranger, so as to create a publication in the sense of the law. The subsequent copying of the letter by another employee does not enlarge the publication, because the whole is but one act. If it could be said that there is a technical publication, it is certainly not an actual one, as understood in the law of libel. It is doubtful whether it will ever be held as American law that the dictation, stenographing and copying of a libelous letter will ever be established as a damaging libel, if done in the ordinary course of necessary business, and not to gratify private malice.—*The National Corporation Reporter*.

CONFLICT OF LAWS—ACTION ON A BOND IN ONE STATE FOR DEFICIENCY ARISING ON FORECLOSURE OF MORTGAGE COVERING LAND IN ANOTHER.—In *Stumph v. Hallahan and Ahern*, decided February, 1905, the Appellate Division of the Supreme Court of New York held that, in an action on a bond, made in New York to recover for a deficiency arising from the foreclosing of a mortgage covering lands in New Jersey, given to secure the bond, the law of New Jersey, regulating proceedings to recover on bonds and mortgages and the foreclosure and sale of property thereunder, governed, citing *Union Nat. Bank of Chicago v. Chapman*, 169 N. Y. 538; Story on Conflict of Laws, 8th ed., sec. 280.

EVIDENCE—PERSONAL INJURY—X-RAY PHOTOGRAPH OF INJURED CHEST ADMITTED.—In *C. & J. Elec. Ry. Co. v. Spence*, 213 Ill. 223, a skiograph or X-ray photo of a portion of an injured plaintiff's chest and body made by an expert, was introduced in an action for personal injuries. It was intended to show by the skiograph that the plaintiff's heart had been displaced, and that the walls of the organ had become thick, and that an abnormally heavy tissue had formed on the heart walls. The court held that such photographs are admissible in evidence after proper preliminary proof of their correctness and accuracy.

ACCIDENT INSURANCE—VOLUNTARY EXPOSURE TO UNNECESSARY DANGER.—In *Buteman v. Traveller's Ins. Co.*, decided by the St. Louis Court of Appeals in February, 1905 (85 S. W. 128), it was held that where one sent back, in the line of his duty, to flag a train, sits down on the track, and involuntarily goes to sleep, and while in such condition is struck by the train, the accident is not caused by his voluntary exposure to unnecessary danger, within the clause of an accident policy, exempting the insurer from liability for an accident resulting from such conduct on the part of insured, citing *Fidelity, etc. Co. v. Chambers*, 93 Va. 138; 24 S. E. 896, 40 L. R. A. 432; *Miller v. Ins. Co.*, 92 Tenn. 167; 21 S. W. 39, 20 L. R. A. 765; *Keene v. Assn.*, 161 Mass. 149, 36 N. E. 891; *Williams v. Assn.*, 82 Hun, 269, 31 N. Y. Supp. 343, and *Id.* 133 N. Y. 367, 31 N. E. 222.

BUILDING AND LOAN ASSOCIATIONS—INSOLVENCY—RIGHTS OF BORROWING MEMBERS—CONSOLIDATION.—In *Kentucky Citizens' Building & Loan Association v. Daugherty*, decided by the Court of Appeals of Kentucky in February, 1905 (84 S. W. 1179), it was held that a borrowing member of an insolvent building